

UNITED STATES DISTRICT COURT

04 10845 GAO

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Ralph R. Nelson

Plaintiff

V.

Tonya Marie Coffey (Nelson)

Sherri Z. Heller
 Commissioner of the Federal Office of
 Child Support Enforcement
 U.S. Department of Health & Human Services
 Washington, D.C.

Carla Townsend
 Clark County, Ohio,
 Child Support Enforcement Agency
 1345 Lagonda Ave.
 Springfield, Ohio
 45503-9989

Robert Suver, Director
 Clark County, Ohio,
 Child Support Enforcement Agency
 1345 Lagonda Ave.
 Springfield, Ohio
 45503-9989

Dannetta Graves, Director
 14 West Fourth Street
 Dayton, Ohio
 45422

Virginia Brown
 Clark County, Ohio,
 Child Support Enforcement Agency
 1345 Lagonda Ave.
 Springfield, Ohio
 45503-9989

Sandra Mendenhall
 Clark County, Ohio,
 Child Support Enforcement Agency

COMPLAINT UNDER
 THE RACKETEER INFLUENCED AND
 CORRUPT ORGANIZATIONS ("RICO") ACT

JURY TRIAL DEMANDED

MAGISTRATE JUDGE

Cohen

RECEIPT # 155169
 AMOUNT \$150 CASH
 SUMMONS ISSUED YES
 LOCAL RULE 4.1
 WAIVER FORM
 MCF ISSUED
 BY DPTY, CLK 260.14
 DATE 4/28/04

1345 Lagonda Ave.	*
Springfield, Ohio	*
45503-9989	*
	*
Debbie Martineau	*
Clark County, Ohio,	*
Child Support Enforcement Agency	*
1345 Lagonda Ave.	*
Springfield, Ohio	*
45503-9989	*
	*
Holly Payne	*
Clark County, Ohio,	*
Child Support Enforcement Agency	*
1345 Lagonda Ave.	*
Springfield, Ohio	*
45503-9989	*
	*
Joel Salway	*
Office of the Magistrate	*
101 North Limestone Street	*
Springfield, Ohio, 45502	*
	*
China L. Widener, Assistant Director	*
Ohio Department of Job and Family Services	*
	*
Tom Hayes, Director	*
Ohio Department of Jobs and Family Services	*
	*
Marilyn Ray Smith	*
Deputy Commissioner of Child Support	*
The Commonwealth of Massachusetts	*
Department of Revenue	*
Child Support Enforcement Division	*
	*

Parties

1. The Plaintiff is an x-ray technologist employed at a hospital in the Boston area. Plaintiff resides at 57 Charter Street, Apt 2A, Boston, Massachusetts, 02113 in the County of Suffolk.
2. Tonya Marie Coffey (Nelson) is an elementary school teacher in Springfield, Ohio. The Defendant resides at 3316 Bristol Drive, Springfield, Ohio, 45503 in the County of Clark.
3. Sherri Z. Heller is the Commissioner of the Federal Office of Child Support Enforcement, U.S. Department of Health and Human Services, Washington, D.C.
4. Carla Townsend. Clark County, Ohio, Child Support Enforcement Agency, 1345 Lagonda Avenue, Springfield, Ohio.
5. Marilyn Ray Smith Deputy Commissioner of Child Support, The Commonwealth of

Massachusetts, Department of revenue, Child Support Enforcement Division.

6. Virginia Brown . Clark County, Ohio, Child Support Enforcement Agency, 1345 Lagonda Avenue, Springfield, Ohio.

7. Sandra Mendenhall .Clark County, Ohio, Child Support Enforcement Agency, 1345 Lagonda Avenue, Springfield, Ohio.

8. Holly Payne .Clark County, Ohio, Child Support Enforcement Agency, 1345 Lagonda Avenue, Springfield, Ohio.

9. Debbie Martineau . Clark County, Ohio, Child Support Enforcement Agency, 1345 Lagonda Avenue, Springfield, Ohio.

10. China L. Widener is the Deputy Director for the Office of Child Support for Ohio. 30 East Broad Street, Columbus, Ohio 43266.

11. Joel Salway , Magistrate, Clark County, Ohio, Common Pleas Court, 101 North Limestone Street, Springfield, Ohio 45502.

12. Dannetta Graves, Director, Montgomery County, Ohio, Child Support Enforcement Agency, 14 West Fourth Street, Dayton, Ohio, 45422

13. Robert Suver, Director, Clark County, Ohio, Child Support Enforcement Agency, 1345 Lagonda Avenue, Springfield, Ohio.

14. Tom Hayes, Director, Ohio Department of Jobs and Family Services. 30 East Broad Street, Columbus, Ohio 43266.

Jurisdiction and Venue

This court has subject matter jurisdiction over the action pursuant to 28 U.S.C Venue is proper in this judicial district pursuant to 28 U.S.C 1391.

Definitions

Secretary means the Secretary of Health and Human Services.

Director means the Director, Office of Child Support Enforcement, who is the Secretary's designee to administer the Child Support Enforcement program under title IV-D.

IV-D Agency means the single and separate organizational unit in the State that has the responsibility for administering or supervising the administration of the State plan under title IV-D of the Act.

Past-due support means the amount of support determined under a court order or an order of an administration process established under State law for support and

maintenance of a child or of a child and the parent with whom a child is living, which has not been paid.

Procedures means a written set of instructions which describe in detail the step by step actions to be taken by child support enforcement personnel in the performance of a specific function under the State's IV-D plan.

State Plan means the state plan for child and spousal support under section 454 of the Act.

Applicable matching rate means the rate of Federal funding of State IV-D programs' administrative costs for the appropriate fiscal year. The applicable matching rate for FY 1990 and thereafter is 66 percent.

THE FACTS

1. In October 1994, while I was at work, my spouse at the time, Tonya Marie Coffey Nelson), and her married boyfriend Tony Sturgill, backed a u-haul truck up to the front door of the house and stole absolutely everything - and abducted my two children. One week prior, to prevent me from helping my children, Tonya Marie Coffey (Nelson) filed a fraudulent domestic violence charge against me in the Common Pleas Court of Montgomery County, Ohio. (Case No. DV-94-265). With no investigation, no questions asked, I lost all contact with my children.

2. Four years later, on 4/26/98, Tonya Marie Coffey (Nelson) confessed to officers of the Springfield police, Officer S.L. Henson and Detective Lt. Moody, the fact that she made up the domestic violence charge. "It never happened". She lied about the occurrence of domestic violence. (See Incident Report - Springfield, Ohio, Police Division # 98-9383).

3. Also on 4/26/98, Tonya Marie Coffey (Nelson) attempted to file, with the Springfield, Ohio police department, another fraudulent police report against me. (See Incident Report - Springfield, Ohio, Police Division # 98-9383). The reporting officer, (officer S.L. Henson) stated - three times - in his report that Tonya Marie Coffey (Nelson) was lying in an attempt to file a fraudulent charge against me. Even though attempting to file a fraudulent police report is a serious crime, Tonya Marie Coffey (Nelson) was not charged by the authorities in Springfield, Ohio. Instead, I, the victimized father, was told by the Springfield, Ohio police to "get out of Dodge". A suggestion I was compelled to follow. Only to discover, the slander to follow me everywhere, perpetrated by Tonya Marie Coffey (Nelson), and memorized and rehearsed by the Ohio Department of Job and Family, the Clark County Court of Common Pleas, and the GAL - was "abandonment ?". I would soon discover - in Ohio, a good Father, is not afforded the protection of the U.S. Constitution.

4. Two fraudulent police reports filed against me in four years. The result of the first fraudulent charge was loosing my children. To this day, my two youngest children have been unable to even speak with their Father. And as I am about to demonstrate - not one single person in the State of Ohio attempted to help my children. The result of the second fraudulent charge was a "suggestion" by the authorities to "get out of Dodge" as the resolution to the problem of being a Father. A suggestion I followed. (A suggestion which

thousands, upon thousands of good, decent Fathers in this country have felt compelled to follow). Only to have the injustice follow me interstate to Massachusetts.

5. The filing of the fraudulent domestic violence charge (paragraph 1) generated a child support order 1994 DV 265. Sets No. 7003705147, in Montgomery County, Ohio, Court of Common Pleas, by Judge V. Michael Brigner. The support order became effective on October 13, 1994. Judge V. Michael Brigner stated in the support order, the support order "terminates October 13, 1995." The court ordered, child support order stated, "grand total owed (for the life of the order) was \$2,600.81". And in accordance with the policies of the Montgomery County Court of Common Pleas and the Montgomery County child support agency, a copy of this order was delivered and received by the Montgomery County child support enforcement agency located at 14 W. Fourth Street, Dayton, Ohio 45401. A copy was also delivered and received by Tonya Marie Coffey (Nelson).

6. On November 5, 1999, now residing and working as an x-ray technologist in Boston, I filed for contested divorce in the Common Pleas Court of Clark County, Ohio.

7. In response to my filing for contested divorce, Tonya Marie Coffey (Nelson) ,on November 11, 1999, submits to Magistrate Joel Salway of the Common Pleas Court of Clark County, Ohio, a signed affidavit that stated " In Montgomery County Common Pleas Court Case No. DV 94-265 , plaintiff is in arrears in child support the approximate amount of \$14,900.00." This arrearage charge was fraudulent. There was no arrearage. Tonya Marie Coffey (Nelson) committed perjury.

8. Four years earlier, on October 13, 1994, Judge V. Michael Brigner, of the Montgomery County Common Pleas Court declared the above child support order terminated. Tonya Marie Coffey (Nelson) committed perjury to: (1) slander my name in the eyes of the Magistrate who would be settling our divorce case, and (2) to extort from me approx. \$15,000.

Conspiring With An Official To Commit Extortion Under Color Of Official Right.

9. Then, to pursue the collection of the extortion money, Tonya meets with the Montgomery County child support enforcement agency. (The fact that no child support order existed was apparently no problem). On November 24, 1999, Tonya Marie Coffey (Nelson) visits the Montgomery County child support office at 14 W. Fourth Street, Dayton, Ohio. It was at this meeting with a representative of the child support enforcement agency where Tonya Marie Coffey (Nelson) convinced the representative of the agency to disregard the court order from Judge V. Michael Brigner ordering the termination of the child support order for case no. DV 94-265. Present at this meeting conducted in the offices of the Montgomery County child support agency was the court order from Judge V. Michael Brigner. In this meeting, Tonya Marie Coffey (Nelson) then convinces the representative to create the following fraudulent arrearage charge against me, and to begin garnishing my wages in Boston, Massachusetts. The consequences of this meeting :

1. The attempted extortion of over \$15,000 from the plaintiff.
2. The collected extortion of approximately \$9,500.00 form the plaintiff.
3. The plaintiff was forced to work two jobs just to survive paycheck to paycheck.
4. Over \$2,000 in expenditures and several years of effort trying to get the defendants to obey the law.

5. The reporting of fraudulent debt charges to the credit reporting agencies.
6. The suspension of the plaintiff's drivers license.
7. The suspension of the plaintiff's professional license.
8. All the while, preventing the plaintiff, any and all contact to his children.

10. On November 24, 1999, at the time of the meeting between Tonya Marie Coffey (Nelson) and the Montgomery County child support enforcement agency, the agency had on record the court order terminating the child support obligation for case no. DV 94-265 on October 13, 1995. Verifying that they knew they were disregarding a court order. They knowingly, and intentionally violated the state IV-D plan, which had been approved by the Secretary of Health and Human Services, under the authority of the social security act, at the request of Tonya Marie Coffey (Nelson).

11. On November 24, 1999, the Montgomery County, Ohio child support enforcement office, generates and mails (via the United States Postal Service) a letter from their offices at 14 W. Fourth Street, Dayton, Ohio 45401, which I receive at my home address of 57 Charter Street, Apt 2A, Boston, Massachusetts. This letter stated I owed "\$14,474.45 in child support arrears". This is the first contact I have ever had with the child support agency. The fear this letter caused upon me was life altering, because this letter was validation that Tonya Marie Coffey (Nelson) could walk into a very powerful government agency and convince them to commit crimes against me. Here was an agency with the capability to destroy my livelihood, (which they would eventually do), and Tonya Marie Coffey (Nelson) obviously had the ability to motivate them to break the law.

12. To understand the full impact of this letter, understand, that one of the individuals who aided and abetted the abduction of my children, Tony Sturgill, (Tonya Marie Coffey (Nelson)'s boyfriend) was feared by me as being a very violent individual. Based upon my belief that anyone who abducts children has to be violent - because abducting children is a violent act. This fear would be proven accurate in the coming years. Two examples; (1) During Tonya Marie Coffey (Nelson)'s deposition on July 27, 2001 in the offices of her Attorney Sanford Flack in Springfield, Ohio, Tonya Marie Coffey (Nelson), under oath, indicated her boyfriend Tony Sturgill was into internet pornography. (2) During a hearing in the Clark County Court of Common Pleas in Springfield, Ohio, I stated I wanted to visit with my children. Upon hearing this, Tony Sturgill flew into a violent rage shouting "you will never see your children." This was witnessed by both attorneys as well as the state police officer who physically removed Tony Sturgill from the building. (He abducts my children, swears to never let their Father see his children, and all they do in Ohio is remove him from the courthouse.)

(WHAT ABOUT THE CHILDREN !)

The Devastating Impact Of The CSEA's Conduct After A Good Father's Children Are Abducted

13. So, my children are abducted by violent people, and no one in the State of Ohio would help me or my children, and I had virtually no resources. All I could think about was how do I protect my children ? Then comes the child support enforcement agency that declares - in light of all the horrific abuse you have already endured - we're going to take away everything else, and there is nothing you can do about it.

14. As demonstrated above, Tonya Marie Coffey (Nelson) had the capability of twice filing

fraudulent police reports against me with no repercussions to her. But with life altering repercussions to myself, and my children. Now, obviously, she could utilize two of the most powerful government organizations, the police and the CSEA, to break the law. Is this what it means to be a Father in America ?

15. On January 13, 2000, the Montgomery County, Ohio child support enforcement office, as requested of them by Tonya Marie Coffey (Nelson), generated and mailed from their office in Dayton, Ohio to my home address in Boston, Massachusetts, a letter titled: Advance Notice To Obligor of Default and Potential Action, for case no. DV 94-265. This letter charged me with an arrearage of \$14,913.05. This same letter also referred to reporting this fraudulent charge to a credit reporting agency and suspending my professional license. Threats they would soon follow through with.

16. The Montgomery County, Ohio, child support enforcement agency, upon the request from Tonya Marie Coffey (Nelson), defied both a court order, as well as their state IV-D plan, and created a fraudulent arrearage charge in order to have my professional license suspended, have my drivers license suspended, destroy my credit rating, and extort from me almost \$15,000. According to Tonya Marie Coffey (Nelson), this was going to be only the down payment demanded from me for Tonya Marie Coffey (Nelson) running away with her boyfriend in October 1994!

17. The Montgomery County, Ohio child support enforcement office, upon the request of Tonya Marie Coffey (Nelson), then generated and mailed a letter from their office in Dayton, Ohio to the Payroll Department at Beth Israel Hospital, 330 Brookline Avenue, Boston, Massachusetts via the United States mail service. This letter ordered, my employer to garnish my wages for over \$14,000.00 in past due support. An order my employer felt legally compelled to obey.

18. Title 45 - Public Welfare, Chapter III - Office of Child Support Enforcement (Child Support Enforcement Program), Administration For Children And Families, Department of Health and Human Services, Part 301 - State Plan Approval And Grant Procedures, Section 301.1 - General Definitions: *Past-due support* means the amount of support determined under a court order or an order of an administrative process established under State law for support and maintenance of a child or of a child and the parent with whom the child is living, which has not been paid. There was no \$14,000 in past due support, because there was no court order for support. The Montgomery County Child Support Enforcement office violated the State of Ohio plan under title IV-D of the Social Security Act.

19. Title 45 - Public Welfare, Chapter III - Office of Child Support Enforcement (Child Support Enforcement Program), Administration For Children And Families, Department of Health and Human Services, Part 301 - State Plan Approval And Grant Procedures, Section 303.4 Establishment of Support Obligations. For all cases referred to the IV-D agency or applying under 302.33 of this chapter, the IV-D Agency must: (b) Utilize appropriate State statutes and legal processes in establishing the support obligation pursuant to 302.50 of this chapter. There was no utilization of state statutes and legal processes in establishing the support obligation that the Montgomery County Child Support Enforcement office used to garnish my wages at Beth Israel Hospital. The letter from Judge V. Michael Brigner of the Montgomery County Court of Common Pleas makes this fact perfectly evident.

20. Title 45 - Public Welfare, Chapter III - Office of Child Support Enforcement (Child Support Enforcement Program), Administration For Children And Families, Department of Health and Human Services, Part 301 - State Plan Approval And Grant Procedures, Section 302.12 Single and Separate Organizational Unit. Paragraph (a) The State plan shall provide for the establishment or designation of a single and separate organizational unit to administer the IV-D plan. Such unit is referred to as the IV-D agency. Paragraph (3) . . . the IV-D agency shall have responsibility for securing compliance by such agency or officials with the requirements of the State plan .

21. The people of the State of Ohio IV-D agency continue to receive Federal tax payers money, while obviously maintaining a complete disregard for the very State IV-D plan approved by the Secretary of Health and Human Services.

22. The next few months I made over sixty (60) telephone inquiries to the Montgomery County, Ohio child support office attempting to get a straight, honest answer regarding what was going on? I never received a straight answer. Instead I received responses like, "we can do whatever we like to you" , I don't have to answer, 'cause you're just a Father". Seeing my exacerbation, my supervisor at Beth Israel Hospital, Mr. Hal Costa even telephoned the Montgomery County , Ohio, Child Support office. After approximately 45 minutes Hal emerged from his office totally exacerbated, and said to me he had been unsuccessful at obtaining any information regarding what was going on.

23. So finally, because there was no other way, I took a day off from work, spent approximately \$1,000 and flew out to Dayton, Ohio. I took a cab to the offices of the Montgomery County child support enforcement agency in Dayton. I walked into the agencies offices, placed upon the counter the letter I had received dated November 24, 1999, and asked (in the most non-confrontational manner) to speak to the person who mailed that letter to me. And this is what I was told!

24. I was informed that the Montgomery County child support enforcement agency had had their "stationary stolen". And a mysterious group of people, a group whose "identity and whereabouts are unknown" to the agency had in fact mailed the letter to me in Boston.

25. Speechless, and in complete shock, I had no alternative but to return home to Boston.

26. Finally in November 2000, I mailed a letter explaining the situation to the Common Pleas Court of Montgomery County, Ohio. And on December 8, 2000, Linda Lee from the clerks office mailed to me and to Beth Israel hospital a letter from Judge V. Michael Brigner ordering the garnishment of my wages to cease. Stating that this order had in fact been terminated on October 13, 1995. (Over four years prior).

27. On June 20, 2001, (NST) of the Montgomery County, Ohio, child support enforcement agency generated an audit for Case No. DV 94-265, and mailed the audit to my attorney, Mark Stone in Centerville, Ohio. The audit states:

Grand Total Owed :	\$2,600.81
Total Amount Paid:	\$12,008.79
Overpayment:	+ \$9,407.98

28. Title 45 - Public Welfare, Chapter III - Office of Child Support Enforcement (Child Support

Enforcement Program), Administration For Children And Families, Department of Health and Human Services, Part 301 - State Plan Approval And Grant Procedures, Section 303.100 Procedures for income withholding. Paragraph (8) The State must have procedures for promptly refunding to non-custodial parents amounts which have been improperly withheld. This policy, mandated by the Federal government, on condition for certifying the State IV-D plans, is obviously also being completely ignored.

29. The Montgomery County, Ohio Child Support Enforcement agency, acting as an agent - not of the courts, nor of the government - but acting as an agent of Tonya Marie Coffey (Nelson) illegally (1) collected \$9,407.98, (2) made a fraudulent charge against me to a national credit reporting agency, (3) took my drivers license, and (4) took my professional license, and (5) made trying to get my life back a full time job. All before I (with the help of Judge V. Michael Brigner), could only partially stop them.

30. The child support obligation for case no. DV 94-265 had been terminated by Judge V. Michael Brigner in the Common Pleas Court of Montgomery County, Ohio on October 13, 1995. Over four (4) years after the court terminated the order, Montgomery County, Ohio child support enforcement agency defies the court order and creates a fraudulent child support arrearage charge. A fraud perpetrated immediately after a meeting between Tonya Marie Coffey (Nelson) and a representative from the Montgomery County, Ohio child support enforcement agency in the offices of the agency.

31. On April 24,2000, Tonya Marie Coffey (Nelson) filed with the Common Pleas Court of Clark County, Ohio, a Motion in Contempt for child support charge against me. On May 17, 2000, I incurred the expense of approximately \$1,000, took the day off from work and traveled to the Common Pleas Court in Springfield, Ohio. Upon my immediate arrival, Tonya Marie Coffey (Nelson) withdrew the charge and fled the courthouse.

32. On July 6, 2000, Tonya Marie Coffey (Nelson) telephoned my apartment and left the following message on my answering machine :

"This is Tonya. I'm calling in regards to the child support and the taxes. And the total amount for taxes is \$2,119.10, child support that was due from February in the amount of \$1,039.06 you total the two up and you get a total of \$3,725.56. What I am going to do is my attorney is on vacation until 7/25, when he gets back in I've already talked about paying for the contempt of court hearing fees and I'm going to get a wage levy against your wages until the \$3,725.56 is paid in full."

33. At the time of this phone message, July 2000, my child support balance was as follows :

Month/Year	Child Support Paid	Child Support Owed	Balance Order # 99 DR 989
December 1999	\$ 1,039.06	\$ 1,039.06	-0-
January 2000	\$ 1,039.06	\$ 1,039.06	-0-
February 2000	-0-	\$ 1,039.06	(\$1,039.06)
March 2000	\$ 1,039.06	\$ 1,039.06	(\$1,039.06)
April 2000	\$ 1,039.06	\$ 1,606.56	(\$1,606.56)
May 2000	\$ 46.62	\$ 1,606.56	(\$3,166.50)

June	2000	\$ 3,641.95	\$ 1,606.56	(\$1,131.11)
July	2000	\$ 1,737.86	\$ 1,606.56	(\$ 999.81)

34. Notice, within her attempt to threaten me, she acknowledges on July 6, 2000, "child support due from February". She acknowledges that the only child support owed was from February 2000. The same as my figures.

35. Obviously, on April 24, 2000, when she filed, yet another, contempt motion against me in the Clark County Court of Common Pleas, charging "\$5,000 in arrearages". She knew she was filing another fraudulent charge.

36. The above referenced threatening phone message occurred on July 6, 2000. The previous month (June 2000) Tonya Marie Coffey (Nelson) received from the plaintiff child support totaling \$3,641.95. In order for the plaintiff to pay this child support amount, the plaintiff had to work 117.30 hours of overtime during the month of June 2000. Almost three extra weeks of work in one month. And the defendant still convinces the child support enforcement agency to generate another fraudulent arrearage charge against the plaintiff. All the while, not one single person in the entire state of Ohio would help the children who were heart-broken over missing their Father.

THIS IS NOT AN INDICATION OF A CIVILIZED SOCIETY.

37. On July 14, 2000, Tonya Marie Coffey (Nelson) follows through with her telephone threat, and meets with Debbie Martineau of the Clark County, Ohio Child Support Enforcement Office. On Tonya Marie Coffey (Nelson)'s request, Debbie Martineau generates an audit for case # 99 DR 989. She then mails this audit from the Clark County, Ohio child support office, via the United States Postal service, to my home address in Boston. This audit states, "Support Paid from 1/1/00 thru 6/30/00 \$3,117.18." And in accordance with policy, Tonya Marie Coffey (Nelson) was provided a copy.

38. This audit, like all others, was wrong. The actual child support paid from 1/1/00 through 6/30/00 was \$ 8,543.61. And as Tonya Marie Coffey (Nelson) demonstrated in her threatening phone call on July 6, 2000, she *knew* this audit from Debbie Martineau was wrong. Again, Tonya Marie Coffey (Nelson) using the child support enforcement agency to inflict harm upon the plaintiff.

39. In October 17, 2000, Tonya Marie Coffey (Nelson) filed in the Clark County Court of Common Pleas, a Motion in Contempt charging "plaintiff owes defendant in excess of \$5,000."

40. Between October 17, 2000 and October 20, 2000, Tonya Marie Coffey (Nelson) visited Virginia Brown at the Clark County, Ohio child support enforcement agency at 1346 Lagonda Avenue, Springfield, Ohio.

41. On October 20, 2000, Virginia Brown, Account Specialist with the Clark County, Ohio child support enforcement agency mailed a letter, (upon the request of Tonya Marie Coffey (Nelson), via the United States postal service, from the CSEA office located at 1346 Lagonda drive, Springfield, Ohio, addressed to Ralph Nelson, 57 Charter Street, Apt 2A, Boston, Massachusetts 02113. This letter stated " a recent audit has been completed on the above referenced case number. (99 DR 989) The audit found a total arrearage of \$

5,369.38 as of 9/30/00".

42. The Clark County, Ohio child support enforcement agency, acting - not as an agent of a court, nor as an agent of the government - but as an agent of Tonya Marie Coffey (Nelson) created a fraudulent child support arrearage charge against me. Tonya Marie Coffey (Nelson)'s criminal influence now controlled two counties within the state of Ohio.

43. The actual child support payments through October 2000, prove my child support balance was OVER paid + \$8,483.80. To keep up with this heavy child support obligation, I worked the following overtime hours preceding :

April 2000	75.30 hours
May 2000	117.30 hours
June 2000	118.50 hours
July 2000	158 hours
August 2000	(Injured at work - requiring surgery)

44. In December, after paying \$ 1,783.36 in child support, bringing the balance to + \$8,768.71, and after working 13 hours of overtime, I was left with approximately \$400 to my name at the end of the month. I was obviously unable to afford another trip to Springfield, Ohio. So Magistrate Joel Salway conducted the hearing in my absence.

45. On January 3, 2001, Joel Salway mailed from the Common Pleas Court of Clark County, Ohio, to myself, a Judgement Entry letter dated January 3, 2001, and signed by Joel Salway. This Judgment Entry proclaimed:

1. I was sentenced to 30 days in jail.
2. All visitation with my children was terminated. My children were prevented from even speaking with me on the telephone.
3. I was ordered to pay Tonya Marie Coffey (Nelson) \$700.
4. My child support obligation, (an obligation that already required me to work an exhausting amount of overtime) was increased \$500.

46. As a direct result of the meeting that took place between Tonya Marie Coffey (Nelson) and Virginia Brown, (an agent of the child support enforcement agency), between October 17, 2000 and October 20, 2000, a fraudulent child support arrearage letter was created and mailed interstate by Virginia Brown. The lives of myself and my children were devastated.

47. At her deposition on July 27, 2001, in the office of her attorney , Sanford Flack in Springfield, Ohio, Tonya Marie Coffey (Nelson) stated under oath " I remember going into child support here and writing this down for them".

48. The consequences of Tonya Marie Coffey (Nelson) "writing it down for them" was, (1) I was unlawfully sentenced to 30 days in prison, (2) all visitation with my children was terminated, (3) I was ordered to pay Tonya Marie Coffey (Nelson) \$700 in additional extortion money, and (4) my child support obligation, (an obligation that already required me to work an exhausting amount of overtime) was increased \$500 per month.

49. In early July 2001, I attempted to appeal up the child support enforcement agencies

chain of command. I mailed from my home a letter to China Widener, who according to the State of Ohio's official web site, was the top child support enforcement official in the state of Ohio. In this letter I mentioned I had evidence of fraud being perpetrated by staff individuals she was accountable for, and I appealed to her for help. I received the following response.

50. On July 30, 2001, in the office of Ohio Job & Family Services, located at 30 East Broad Street, Columbus, Ohio 43266, a letter was generated and signed by Lee Ann Cooper, Bureau Chief. On the same date, July 30, 2001, this letter was mailed, (and subsequently received) via the United States Postal Service to Rob Nelson 57 Charter Street, Boston, Massachusetts 02113.

51. In the above detailed letter, Lee Ann Cooper acknowledges in the opening paragraph that China Widener had received my inquiry "regarding your child support concerns." Paragraph 4 of the above letter states, " You state there is evidence of fraud committed by our staff. You may present evidence supporting your claim at a State Hearing."

52. On August 22, 2001, I mailed a letter addressed to the Ohio Department of Human Services State Hearings, 30 East Broad Street, 31st floor, Columbus, Ohio 43266, requesting a state hearing.

53. On September 2001, I received a letter from the Ohio Job & Family Services, 30 East Broad Street, Columbus, Ohio 43266 which stated my request for a state hearing was declined. With no further explanation provided.

54. China Widener, and her staff, knew I had "evidence of fraud committed by our staff" , and China Widener and her staffs unconscionable response was to recommend a state hearing, and then deny the state hearing. Because China Widener, and her staff refused to address my concerns, the following happened.

55. I then made a second request to the Ohio Job & family Services for a hearing. This was not only denied, but the very next sentence in this denial letter stated "you were charged with domestic violence in Montgomery County." They learned of the domestic violence charge against me, (I suspect from Tonya Marie Coffey (Nelson) , a charge proven to be fraudulent, and their response is to forfeit my legal right to a hearing.

56. Tonya Marie Coffey (Nelson) then submitted this fraudulent child support arrearage letter to Magistrate Joel Salway at the Common Pleas Court of Clark County, Ohio.

57. Magistrate Joel Salway, referencing this fraudulent letter, then sentenced me to 30 days in jail. Terminated all visitation with my children. Ordered me to pay (reward) Tonya Marie Coffey (Nelson) \$700. And increased my monthly child support by \$500. And China Widener's complete disregard for the state IV-D plan, approved by the Secretary of Health and Human Services, meant the incarceration of another good Father.

58. I was then ordered to appear in the Common Pleas Court of Clark County, Ohio on December 27, 2001.

59. On December 18, 2001, Sandra Mendenhall of the Clark County Child Support Enforcement agency generates a Payment Record Certification "covering the period 5/1/99

thru 12/17/01." Claiming an arrearage of \$ 5,194.56. Actual child support payment history validates a balance of + \$ 8,556.68 as of the end of December 2001. A review of this notarized Payment Record Certification demonstrates that the records for the month of December 1999 have been removed as one technique used to create a fraudulent arrearage charge against the plaintiff. Tonya Marie Coffey (Nelson) then submits this Payment Record Certification to the Clark County Common Pleas Court nine days later.

60. On December 27, 2001, in the Common Pleas Court of Clark County, Ohio, I submitted to the court and Magistrate Joel Salway the following child support payment history documentation:

Month / Year	Child Support Paid	Child Support Owed	Balance
December 1999	\$1,039.06	\$ 1,039.06	- 0 -
January 2000	\$1,039.06	\$ 1,039.06	- 0 -
February 2000	- 0 -	\$ 1,039.06	(\$1,039.06)
March 2000	\$ 1,039.06	\$ 1,039.06	(\$1,039.06)
April 2000	\$ 1,039.06	\$ 1,606.56	(\$1,606.56)
May 2000	\$ 46.62	\$ 1, 606.56	(\$3,166.50)
June 2000	\$ 3,641.95	\$ 1,606.56	(\$1,131.11)
July 2000	\$ 1,737.86	\$ 1,606.56	(\$ 999.81)
August 2000	\$ 1,698.50	\$1,606.56	(\$ 907.87)
Sept 2000	\$ 2,019.79	\$ 1,606.56	(\$ 494.64)

61. On January 3, 2001, Magistrate Joel Salway looked at the letter, on Clark County child support enforcement stationery, prepared and signed by Virginia Brown, and submitted to the court by Tonya Marie Coffey (Nelson) which stated I was "in arrears \$5,369.38". Magistrate Salway also looked at the Contempt Charge document submitted to the court by Tonya Marie Coffey (Nelson) which stated, "plaintiff owes defendant in excess of \$5,000". Magistrate Salway also looked at the above documentation I submitted. Every child support payment was verified by the check receipts, and the child support obligations were verified by the divorce decree.

62. And, after looking at the September 2000 balance of (\$ 494.64) - proven by the check receipts -Magistare Joel Salway wrote under the heading, Findings of Fact and Conclusions of Law : "It is undisputed that the plaintiff was ordered to pay child support per the Decree of Divorce. It is further undisputed that the plaintiff has not done so and is in arrears in excess of \$5,000."

63. Magistrate Joel Salway lied. Then he terminated all contact between my children and their Father, increased my monthly child support obligations, ordered a large amount of extortion money be paid to Tonya Marie Coffey (Nelson) and recommended my children's Father be incarcerated. Magistare Joel Salway then stated I had the "opportunity" to "purge" myself from these criminal acts being perpetrated against me, if I pay a large amount of money to Tonya Marie Coffey (Nelson). This is extortion.

64. And the genesis of all this criminal behavior, was a meeting between Tonya Marie Coffey (Nelson) and Virginia Brown, (an agent of the child support enforcement agency), conducted within the premises of the Clark County, Ohio, child support enforcement agencies offices

located at 1345 Lagonda Avenue, Springfield, Ohio. Virginia Brown of the Ohio child support enforcement agency, in direct response from Tonya Marie Coffey (Nelson) was not acting as an agent of the government, nor was she acting as an agent of a court, but as an agent for Tonya Marie Coffey (Nelson).

65. I requested two (2) more Mistake-of-Fact hearings to: Clark County CSEA, 1346 Lagonda Avenue, P.O Box 967-A, Springfield, Ohio 45501. Both requests were denied. Bringing the total number of denials of requests for hearings to four (4). And yet, every hearing that Tonya Marie Coffey (Nelson) has requested has been not only granted, but the Clark County, Ohio, Child Support Enforcement office sends me a bill for over \$1,500 for the "administrative cost" of these hearings requested by, and attended solely by Tonya Marie Coffey (Nelson). How close is this relationship between Tonya Marie Coffey (Nelson) and the state of Ohio child support enforcement agency? On February 4, 2004, I filed with the clerk/magistrate for the Suffolk Superior Civil Court, Commonwealth of Massachusetts, 90 Devonshire Street, 8th floor, Boston, Massachusetts, Civil Action Docket No. 04-0496A, Ralph R. Nelson (plaintiff) v. Tonya Marie Coffey (Nelson) (defendant) . A complaint for the Tortious Interference with Contractual / Advantageous Relations over my job loss at Brockton hospital. (Described below). The child support enforcement agency was not named as a defendant in this case. And yet, when Tonya Marie Coffey (Nelson) was served the summons at 2:10pm., on February 13, 2004, her immediate reaction was to seek out her collaborators at the Clark County, Ohio child support enforcement agency. Within two hours of being served the above summons, Tonya Marie Coffey (Nelson) was physically in the offices of the Clark County, Ohio child support enforcement agency located at 1346 Lagonda Avenue, Springfield, Ohio.

Incentive Payments

66. The CSEA incentive program has had a devastating affect upon our American families.

- (a) First, Tonya Marie Coffey (Nelson) walks into a county CSEA office and requests the CSEA staff to commit life altering crimes against a Father - and a Vet. And the CSEA staff have no problem acquiescing.
- (b) The county CSEA then reports the additional collections to their State CSEA office, while boasting the amount of collections on their web site. All the while knowing their is evidence that predicate crimes are being committed in the collection of some of these monies. The State office in turn, rewards the county office with increased tax payers dollars.
- (c) The State office then reports the increased collections to the Federal office, while boasting the amount of collections on their web site. All the while knowing their is evidence that predicate crimes are being committed in the collection of some of these monies. The Federal office in turn, rewards the State office with increased tax dollars.
- (d) The Federal office then boasts the additional collections on their web site. Which is referenced when obtaining additional federal tax payers monies.

67. Fatherhood - held for ransom. (read: incentive payments) And my children and I are not alone. Tonya Marie Coffey (Nelson) :

- (1) Convinced the child support enforcement agency to break the law, and these agents continue to treat me as "you're just a Father". I'm merely another disgruntled Father. So I don't matter.
- (2) Convinced the police to break the law, and the police concluded I was just another disgruntled Father, so I had better "get out of Dodge".
- (3) Convinced the Clark County, Ohio, Court of Common Pleas to break the law. And this group has been the worst offenders of always implying I was 'just another disgruntled Father".

68. Is this how my beloved country should be treating its Fathers ? Is this how my beloved country should be treating its veterans?

69. On January 12, 2004 I telephoned Carla Townsend at the offices of the Clark County, Ohio child support enforcement agency, 1345 Lagonda Avenue, Springfield, Ohio. As was customary, I literally had to plead with all my heart for the opportunity to finish a sentence.

70. The purpose of my telephone call was to request Ms. Townsend's help in getting Tonya Marie Coffey (Nelson) to give our eldest daughter (Thomasina) , Thomasina's monthly child support money. Thomasina desperately needed her child support money for school, but the child support enforcement agency was giving Thomasina's child support money to Tonya Marie Coffey (Nelson). Thomasina had informed me that her mother would not provide her with her child support money. So I sought help from the child support enforcement agency. Carla Townsend expressed no apologies for her subordinates, in her office, conducting their affairs through a pattern of racketeering. *Section 1962(c)*. Carla Townsend expressed no apologies for her subordinates, in her office, conspiring to commit crimes against myself and ultimately my children as well. *Section 1962(d)*. Carla Townsend expressed no apologies for her subordinates, in her office, committing mail fraud. *Section 1341*. Carla Townsend expressed no apologies for the illegal jail sentence which prevented me from doing business in Ohio. Carla Townsend expressed no apologies for the criminal interference in Brockton, Massachusetts which prevented me from doing business in Brockton, Massachusetts. Carla Townsend expressed no apologies for the taking of my drivers license preventing me from doing business anywhere except on the public transportation routes. Carla Townsend expressed no apologies for the reporting of a (fraudulent) arrearage charge being reported to a national credit reporting agency. Carla Townsend expressed no apologies for the fact that I was prevented from having a bank account. Carla Townsend expressed no apologies for the taking of my professional license preventing me from doing business anywhere in the country. And Carla Townsend expressed no apologies for my children who do not know who their Father is, who do not know how hard their Father has been trying to reassure them that he loves them.

71. Instead, Carla Townsend passionately expressed her heartfelt exacerbation at not being able to collect more money from me each month.

72. In January 2004, I was required by the Clark County Court of Common Pleas to pay in child support \$1,606.56. In January 2004, I paid in child support \$ 1,970.32. In January 2004, after working 44.5 hours of overtime, (an extra 5 1/2 days of work in one month), in order to pay this child support - I had less than \$200 in my pocket - and to my name. And Carla Townsend was exacerbated because she could not collect more money from me!

73. These crimes are sending good, innocent Fathers and Veterans to prison. And causing huge numbers of children in this country to have to grow up Fatherless.

Magistrate Joel Salway and the Clark County Court of Common Pleas

Tonya Marie Coffey (Nelson's) predatory behavior towards the Plaintiffs Employers

74. On 12/12/01, I signed an employment contract with Brockton hospital, 680 Centre Street, Brockton, Massachusetts, 02402. The employment contract specified the following compensation:

Regular Hourly Rate	\$ 30
Minimum of 80.00 hours per pay period	
Shift Differential	\$ 1
Monthly Housing Subsidy	\$ 1,300
Monthly Transportation Allowance	\$ 800
Completion Bonus	\$ 2,500

75. On 12/27/01, I bore the expense and the time off from work, and traveled to the Clark County Court of Common Pleas in Springfield, Ohio to present to the court my evidence proving the charges against me were knowingly fraudulent. The idea of entering a court of law that was so contemptuous of Fathers was daunting. At the time of the hearing, I provided to the court and to Tonya Marie Coffey (Nelson), my current place of employment as Brockton hospital. As well as the information that I had just begun working at Brockton hospital.

76. On 12/28/01, the very next morning, the defendant telephoned the Human Resource department of Brockton hospital, and told Robin Kirby, Coordinator, Human Resources, that "you recently hired an x-ray tech with a domestic violence charge." Upon arriving at work on 12/28/01, I was called in to the HR office and, in the presence of my supervisor, was terminated based solely upon this phone call.

Tonya Marie Coffey (Nelson's) intent to commit a crime

77. There is only one obvious motive for Tonya Coffey (Nelson) telephoning my employer and stating "you recently hired an x-ray tech with a domestic violence charge." Tonya Coffey (Nelson)'s motive was to cause me to lose my job.

Tonya Marie Coffey (Nelson)'s attorney admits Tonya Coffey (Nelson) committed the crime.

78. On January 3, 2002, Tonya Coffey (Nelson)'s attorney, Brenda Bonecutter admits that Tonya Coffey (Nelson) telephoned Brockton hospital Human Resource department on the morning of 12/28/01, when attorney Bonecutter mailed a letter, on her stationary, to attorney Mark Stone, in which she wrote, "upon my client contacting the name and address of the employer your client gave." In attorney Mark Stone's letter to the plaintiff dated January 9, 2002, attorney Mark Stone confirmed Brenda Bonecutter's acknowledgment and admittance that Tonya Coffey (Nelson) did telephone my place of employment. Attorney Mark Stone wrote, "this letter from her attorney does at least corroborate that your x-wife called and had contact with someone at your place of employment."

79. And as usual, when Magistrate Joel Salway was informed of what transpired, he sought no action to protect me from this chronic violence.

The Result Of The Crime

80. I lost my \$7,060 per month employment. I was humiliated. And my reputation decapitated. I then had to accept a lesser job earning substantially less money at another hospital. Always living in fear, because all it takes from Tonya Marie Coffey (Nelson) is a phone call.

81. On Thursday, April 8, 2004, at 11:50 a.m., the defendant, Tonya Marie Coffey (Nelson) left the following threatening message on the plaintiffs answering machine:

"Hey Rob, this is Tonya I just received my notification from your Commonwealth of Massachusetts Suffolk County Superior Court with Michael Joseph Donovan stating that the (craziness) is going to stop, no action will be taken, or necessary, so hopefully this will prove to you that your craziness attempt in your own court is not going to work and if you or your girlfriend, Linda McCabe living in Reading, (Ohio) and yes I do know where both of you work still if you want to continue this I'm going to put you in our court system and sue you for slander So bring it on."

82. Three (3) of the plaintiff's employers have been contacted interstate by the defendant Tonya Marie Coffey (Nelson).

- First. The defendant Tonya Marie Coffey (Nelson) contacted Beth Israel Hospital in Boston and managed to extort from the plaintiff approximately \$9,500.00.
- Second. The defendant Tonya Marie Coffey (Nelson) contacted Brockton Hospital and directly caused the plaintiff to be terminated from his gainful employment.
- Third. As recently as April 8, 2004, the defendant, Tonya Marie Coffey (Nelson) has verified she has been actively seeking the place of employment of both the plaintiff, and the plaintiff's fiancé. And the defendant, Tonya Marie Coffey (Nelson) has claimed the fact that she has located the employers of both the plaintiff and the plaintiff's fiancé. And the defendant, Tonya Marie Coffey (Nelson) has made it quite clear she aims continue to do harm to the defendant and his fiancé.

83. We believe very, very strongly that the defendant Tonya Marie Coffey (Nelson's) obsession with locating, and then contacting with the intent to do harm, the plaintiff's places of employment, is proof of Tonya Marie Coffey (Nelson's) predatory personality.

The Continuity Of The Pattern For Nine (9) years (and beyond)

84. October 2003, Tonya Marie Coffey (Nelson) telephoned the Massachusetts Child Support office and quoting the child support enforcement agencies fraudulent arrearage charge, (a charge I have proven she *knew* to be fraudulent), she requested Massachusetts to place me on their 'Ten Most Wanted List.' The result if this had occurred, as described to me by an official of the Massachusetts Child Support Agency is that the police would have

come into my place of employment, arrested me, and thrown me in jail. The second time Tonya Marie Coffey (Nelson), using child support arrearage charges she knew to be fraudulent, attempted (the first instance succeeding), in getting the child support enforcement agency to incarcerate me. And the fourth attempt at having me wrongfully incarcerated as my punishment for my spouse running away with her boyfriend nine years prior.

AND THE CHILD SUPPORT ENFORCEMENT AGENCY HAS DONE NOTHING TO EVEN ADDRESS THIS LIFE THREATENING ABUSE.

85. In August 2003, my eldest daughter Thomasina, who had been residing with her Mother, Tonya Marie Coffey (Nelson), since being wrongfully taken by her mother in October 1994, contacted me via my brother. Thomasina informed me that she had left her Mother's home in Springfield, Ohio, in May 2003. During these six months, she had traveled from friends home to friends home seeking a couch upon which she could sleep. Thomasina was living off a credit card, while her mother collected her monthly child support monies. Thomasina asked me if I could bring her to Boston to live. A friend of mine then used her credit card to purchase an airline ticket for Thomasina to travel to Boston. I then took Thomasina to enroll at Bunker Hill Community College. I paid approximately \$2,000 in tuition and books for the Fall semester at Bunker Hill. And I slept on the floor so Thomasina could sleep on the only bed in my small one room efficiency. I then paid off Thomasina's credit card.

86. During the next six months, the Massachusetts Department of Revenue, Child Support Division garnished my paychecks for child support for Thomasina. Massachusetts sent Thomasina's child support money to Tonya Marie Coffey (Nelson) in Springfield, Ohio, while Thomasina resided with me in Boston, Massachusetts. And of course, Thomasina stated her Mother would not send Thomasina her child support monies. Money Thomasina desperately needed for school. When I requested the child support enforcement agency send Thomasina her child support money, they again denied assistance.

87. So, in October 2003, when Tonya Marie Coffey (Nelson) telephoned from Springfield, Ohio to the Massachusetts Child Support office in Boston, Massachusetts and requested that I be placed on their 'Ten Most Wanted' list, Thomasina was living with me, being financially supported by me, while Tonya Marie Coffey (Nelson) collected Thomasina's child support money - and Tonya Marie Coffey (Nelson) still made fraudulent charges to the child support agency in an attempt to have me incarcerated. With no obvious thought as to the consequences to Thomasina and the other two children still being held in Springfield, Ohio until their child support terminates.

88. Tonya Marie Coffey (Nelson) has no comprehension of the consequences of her violent, abusive, predatory behavior.

89. This is the same daughter, that Magistrate Joel Salway refused to help.

Affect On Interstate Enterprise

1. The illegal jail sentence prevented me from doing business in Ohio.
2. The criminal interference in Brockton, Massachusetts prevented me from doing business in Brockton, Massachusetts.

3. The illegal taking of my drivers license prevented me from doing business anywhere except on the public transportation lines.
4. And finally, the taking of my professional license prevented me from doing business anywhere in the country.

90. I AM NOT ALONE. While I was present in the offices of the Massachusetts Child Support enforcement agency, still attempting to grasp the extent of the malice perpetrated against me, I was informed by an agent of the child support agency - regarding the utilizing of fraudulent charges to destroy the lives of good Fathers, - " Mothers do this all the time. It happens a lot!" My response was, " What is the child support agency doing about it." The straight faced answer was, " NOTHING".

91. On 9/30/02 , The Commonwealth of Massachusetts, Department of revenue, Child Support Enforcement Division, P.O. Box 55144, Boston, Massachusetts 02205 generated a letter which they mailed , via the United States Postal Service, to my home address, 57 Charter Street, Apt 2A, Boston, Massachusetts, 02113. This letter charged me with owing "\$8,531.65 in arrears." Included in this letter was the threat to "increasing your income assignment by 25%, levy funds from your bank account, seize your assets, report this (fraudulent) charge to a credit reporting agency, and revoke your professional license.). ALL OF WHICH THEY DID. And this arrearage charge was fraudulent. My child support payment receipts as of 9/30/03 were + \$ 11,271.46. Tonya Marie Coffey (Nelson) knew this arrearage charge was fraudulent. The Massachusetts CSEA knew I had evidence of this charge being fraudulent. The Massachusetts CSEA staff told me he suspected this charge to be wrong. The Massachusetts CSEA staff told me "Mothers do this all the time. It happens a lot." And yet, Marilyn Ray Smith and her staff are doing nothing about these crimes, except of course, reporting the additional collections for the incentive program.

92. Title 45 - Public Welfare, Chapter III - Office of Child Support Enforcement (Child Support Enforcement Program), Administration For Children And Families, Department of Health and Human Services, Part 301 - State Plan Approval And Grant Procedures, Section 303.35 Administrative Complaint Procedure. (a) Each State must have in place an administrative complaint procedure, defined by the State, in place to allow individuals the opportunity to request an administrative review, and take appropriate action when there is evidence that an error has occurred. To admit that I had "evidence of fraud committed by our staff" , and to do nothing about it, clearly is a complete disregard for the State IV-D plan. 18 U.S.C 1346 : Deprivation of right to honest services constitutes a form of mail and wire fraud.

93. On 10/29/02, I mailed a letter to Mr. Alan Lebovidge, Commissioner, Commonwealth of Massachusetts, Department of Revenue, P.O. Box 55149, Boston, Massachusetts. I literally pleaded for the termination of all fraudulent activity perpetrated against my children and their Father. And just like in Ohio, I informed him that I had "proof that these allegations are fraudulent". Evidence that this was a great deal more serious than a miscalculation of money owed. This was proof of criminal offenses taking place. And again, just like Ohio - not a drop of concern!

94. On 10/29/02, I mailed a letter to Ms. Marilyn Ray Smith, Deputy Commonwealth of Massachusetts, Department of Revenue, P.O. Box 55149, Boston, Massachusetts. I literally pleaded for the termination of all fraudulent activity perpetrated against my children and their Father. And just like in Ohio, I informed her that I had "proof that these allegations are fraudulent". Evidence that this was a great deal more serious than a mere miscalculation of